IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW BEMPAH,

PLAINTIFF,

v.

MIDLAND CREDIT MANAGEMENT, INC.

DEFENDANT.

Case No. 22-cv-748

Hon. Rebecca R. Pallmeyer

NOTICE OF ACCEPTANCE OF RULE 68 OFFER OF JUDGMENT

Plaintiff, by and through counsel, hereby accepts Defendant's Rule 68 Offer of Judgment, attached hereto as Exhibit A, and requests that this Honorable Court (1) enter the judgment against Defendant Midland Credit Management, Inc. in the amount of \$1,001, plus reasonable attorney's fees and costs, and (2) grant leave to parties to confer pursuant to Local Rule 54.3 on Plaintiff's attorneys' fees and costs or for Plaintiff to file a fee petition.

Respectfully submitted,

By: <u>/s/ Bryan Paul Thompson</u> One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Bryan Paul Thompson, hereby certify that on Monday, April 11, 2022, I caused a true and accurate copy of the foregoing document to be filed via the courts CM/ECF online system, which sent notice via email to all counsel of record and to counsel for Defendant via email at:

Nicholas D. O'Conner (ARDC# 6302672) noconner@lockelord.com Brian D. Nevel (ARDC# 6309777) brian.nevel@lockelord.com

LOCKE LORD LLP 111 South Wacker Drive Chicago, Illinois 60606 Phone: 312-443-0700

Respectfully submitted,

By: s/ Bryan Paul Thompson